

EXHIBIT 1

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2
3 UNITED STATES DISTRICT COURT
4 DISTRICT OF NEW JERSEY, CAMDEN VICINAGE

5 *In re Valsartan Products Liability* MDL No. 2875
6 *Litigation*

7 This document relates to:

8 Case No.: 1:20-cv-20602-RBK-SAK

9 Richard Allen Williams and
10 Genita E. Johnson v. Zhejiang
Huahai Pharmaceutical, Ltd et al.

Hon. Robert B. Kugler, United States
District Judge

11 Hon. Sharon A. King
12 Magistrate Judge
13

14 **RESPONSE TO OSC/REQUEST FOR 30-DAY CONTINUANCE OF OSC**
15
16 **OR EXTENSION OF TIME TO FILE PLAINTIFF'S FACT SHEET**

17 Plaintiff Richard Allen Williams, requests this Court continue the OSC
18 scheduled for October 6, 2022, for 30 (thirty) days while Plaintiff determines
19 whether to voluntarily dismiss this action against Defendants. Currently, Plaintiff
20 who is a doctor, with assistance of counsel Alvin L. Pittman, is now, and has been
21 for the past few weeks, in the process of reviewing the opinions of Plaintiffs' expert
22 witnesses disclosed in the In re Valsartan Products Liability case, pursuant to Rule
23 26 of the Federal Rules of Civil Procedure. (See Declaration of Alvin L. Pittman).
24 Plaintiff is also reviewing the studies cited in the medical expert opinions. Based on
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1 this review, Plaintiff will make the decision whether to continue prosecuting his
2 claims, file his Plaintiff's Fact Sheet or will voluntarily dismiss his action.

3 WHEREFORE, Plaintiff hereby respectfully requests that this Court
4
5 grant the following relief:

- 6 1) Order that the OSC currently set for October 6, be continued for
7 approximately 30 days to a subsequent CMC date to allow Plaintiff
8 to complete his review of the applicable expert opinions and studies
9

10 AND/OR

- 11 2) Extension of time to file Plaintiff's Fact Sheet.
12

13
14 DATED: October 4, 2022

LAW OFFICES OF ALVIN L. PITTMAN

15 By: /s/ Alvin L. Pittman

16 Alvin L. Pittman (SB #127009)

17 Email: office@apittman-law.com

18 Attorneys for Plaintiffs

19 Richard Allen Williams

LAW OFFICES OF ALVIN L. PITTMAN

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11 Magistrate Judge

12 CERTIFICATE OF SERVICE

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14 I certify that on October 4, 2022, in addition to defendants served on
15 October 4, 2022, via the CM/ECF system, I served the Response to OSC/Request
16 for Extension of Time to Respond to OSC Or for Extension of Time to File
17 Plaintiff's Fact Sheet on Defendants, Aurobindo Pharma. Ltd., Aurolife Pharma
18 LLC.; Aurobindo Pharma USA, Inc., through their counsel of record as follows, and
19 other counsel for defendants, via email which was successfully transmitted:
20
21

22 Elizabeth.hood@morganlewis.com; Caitlin.mckenna@morganlewis.com;
23 lockardv@gtlaw.com; Jessica.miller@skadden.com; john.lavell@morganlewis.com;
24 john.gisleson@morganlewis.com; Clem C. Trischler at cct@pietragallo.com;
25 William.Kuzma@William.kuzma@morganlewis.com
26
27

1 DATED: October 4, 2022

2 /s/ Alvin L. Pittman

3 Alvin L. Pittman

4 Law Offices of Alvin L. Pittman

5 5777 W. Century Blvd., Ste 1685

6 Los Angeles, CA 90045

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10 Attorneys for Plaintiffs Richard Allen

11 Williams and Genita E. Johnson

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**Hon. Robert B. Kugler, United States
District Judge**

11 **Hon. Sharon A. King**
12 **Magistrate Judge**

13
14 **DECLARATION OF ALVIN L. PITTMAN**

15 I, Alvin L. Pittman, declare as follows:

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17 1. I represent Plaintiff Richard Allen Williams (“Plaintiff”) in the current action.

18 I have personal knowledge of the facts set out in this statement, and if called to

19
20 testify could and would testify truthfully as to the matters stated below. I make this

21 declaration in support of Plaintiff’s Response to OSC/Request for 30-day

22 Continuance of OSC or Extension of Time to File Plaintiffs’ Fact Statement.

23
24 2. I have downloaded copies of all the expert opinions disclosed by Plaintiffs in

25 the In re Valsartan Products Liability Litigation cases in the MDL. My client, who

26 is a doctor, has been and still is reviewing the expert opinions and some of the

1 studies cited by those experts to determine where his case fits, or doesn't, in the
2 action.

3 3. Plaintiff requests just a brief extension of time to complete his review of the
4 opinions and studies and make a determination of whether to continue as part of the
5 MDL, file his Plaintiff's Fact Sheet, or voluntarily dismiss his case. This review
6 would have occurred earlier but for my second bout with COVID-19 which took me
7 out of the office for approximately 6 weeks this summer, causing serious
8 exacerbation of my chronic lung condition.
9

10
11 4. I anticipate, based on the progress of reviewing these expert opinions, that
12 another 30 days will allow completion of the task of review, discussion and the
13 above-described decision-making process.
14
15

16 **I declare under penalty of perjury that the foregoing is true and correct,**
17 **pursuant to the laws of the State of California and United States.**
18

19 **Executed this 4th day of October 2022, in Los Angeles, California.**

20 /s/ Alvin L. Pittman
21 ALVIN L. PITTMAN, DECLARANT
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**Hon. Robert B. Kugler, United States
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11 **Hon. Sharon A. King**
12 **Magistrate Judge**

13 **[PROPOSED] ORDER**
14

15 The Court having reviewed the Plaintiff Richard Allen Williams' Request
16 for Continuance of OSC or Extension of Time to File Plaintiff's Fact Sheet and, for
17 good cause shown,
18

19 IT IS on this _____ day of _____ 2022, hereby

20 ORDERED that Plaintiff's Request for 30 day Continuance of OSC or
21 Extension of Time to File Plaintiff's Fact Sheet is GRANTED. Plaintiff shall have
22 until _____ to file his Plaintiff's Fact Sheet. The OSC is continued
23 until _____, 2022.
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DATED: October ____ , 2022

U.S. DISTRICT COURT JUDGE

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